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October 17, 2024

The Honorable George C. Hanks, Jr.
United States District Judge
United States Courthouse
515 Rusk Street, Room 6202
Houston, Texas 77002

Re: *In re Alta Mesa Resources, Inc. Securities Litigation*
Case No. 19-CV-00957 (S.D. Tex.) (consolidated)

Dear Judge Hanks:

In light of several settlements in principle reached in recent days with the Individual Action Plaintiffs, we are writing to respectfully request a short continuance of (1) the deadline to file the pre-trial materials, (2) the pre-trial conference, and (3) the trial to accommodate consummation of those settlements and (assuming their consummation) recalibration of the trial scope and issues as to the remaining parties and issues.

As we advised the Court on Tuesday, the Individual Action Plaintiffs and the AMR and Riverstone Defendants (the “Settling Defendants”) have agreed to a settlement in principle that they are in the progress of documenting over the next two weeks and that they expect will become final in about 5-6 weeks. We also understand that the Individual Action Plaintiffs have a settlement in principle with HPS. If consummated, these settlements will resolve all claims brought by the Individual Action Plaintiffs against these Defendants and also mean that none of the claims against HPS will be going to trial. Accordingly, deferring deadlines and the trial date to accommodate documentation and consummation of these settlements will promote streamlining of the trial in several ways.

First, the parties need time to finalize their settlements in principle and confirm they are effective prior to trial beginning. While we are working as quickly as we can, we are unable to do so before November 4th, in part due to the time necessary to secure payment from insurance carriers. We believe it would be wasteful to start the trial before the Court and parties know whether the Individual Action Plaintiffs are part of the claims and parties.

Second, the remaining Defendants need to revise their trial strategy, jury instructions, and even the witness schedule in light of this dramatic change in the scope and shape of the trial. Correspondingly, if the pending settlements are consummated, the pretrial submissions of the Settling Defendants, BCE, and ARM (due Monday October 21st) will need to be substantially

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revised to address only the claims and defendants going to trial. The parties have been negotiating these documents for months and removing the settled claims and defendants from the JPTO and related documents is not easily done. And we cannot realistically do so until we have more clarity on whether the Individual Action Plaintiffs will play any part in the trial and know for certain who and what will be on trial.

Finally, this continuance would also allow the parties the time to see if BCE and ARM can also resolve their remaining claims with the Individual Action Plaintiffs and/or if any of the remaining Defendants can reach additional settlements with the Class Action Plaintiffs, with the assistance of the parties' mediators of course. This multi-week trial is going to be a significant time and expense for the Court, parties, and third-party witnesses. Given the recent settlements in principle, additional time will provide the Court and the parties the clarity necessary to have an orderly trial that fully and finally resolves all remaining claims – whatever those end up being.

The Class Action Plaintiffs have told us they adamantly oppose this request, and Individual Action Plaintiffs have told us they oppose this request at this time.

Respectfully submitted,

/s/ Kenneth A. Young

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